

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

MDL No. 16-2738 (FLW) (LHG)

THIS DOCUMENT RELATES TO ALL CASES

**PLAINTIFFS' MOTION TO SEAL EXHIBITS TO PLAINTIFFS' STEERING
COMMITTEE'S OBJECTION TO SPECIAL MASTER'S LETTER OPINION ON
DEFENDANT IMERYS TALC AMERICA'S CLAWBACK REQUEST**

Pursuant to Rule 5(d) of the Federal Rules of Civil Procedure and Local Civil Rules 5.3(c) and 7.1, Plaintiffs, by and through Plaintiffs' Steering Committee, hereby move to file **Exhibits 1, 2, and 3** to Plaintiffs' Steering Committee's Objection to the Special Master's Letter Opinion on Defendant Imerys Talc America's Clawback Request (Dkt. No. 8141) under seal, and to redact those portions of the Objection that quote or otherwise reference the contents of the sealed exhibits.

Imerys Talc America, Inc. has asserted the marital communications privilege with respect to the emails at issue (**Exhibit 1**), and **Exhibits 2 and 3** contain and/or quote relevant portions of the emails. Therefore, Plaintiffs move the Court for leave to submit the exhibits to the foregoing Objection and portions of the Objection that quote or reference the emails under seal.

A proposed form of Order has been simultaneously submitted.

Dated: November 20, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

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